REMARKS

The Examiner is thanked for the performance of a thorough search. Claims 1 and 12 are canceled. Claims 2, 13, 23 and 33 are amended. Hence, Claims 2-11 and 13-45 are now pending in the application. Each issue raised in the Office Action mailed September 16, 2009 is addressed hereinafter.

I. ISSUES RELATING TO ALLEGED PRIOR ART

A. CLAIMS 1-45 – 35 USC § 103: UNDERWOOD, UNDERWOOD2

Claims 1-45 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Underwood, John et al., U.S. Patent No. 6,697,825 ("Underwood") in view of Underwood, Roy Aaron., U.S. Patent No. 6,523,027 ("Underwood2"). (Office Action, page 3) The rejection is respectfully traversed.

CLAIM 2

Present Claim 2 recites:

2. A method of automatically generating a consistent user interface for an application program, the method comprising the computer-implemented steps of:

assisting a user with building an HTML user interface page by:
receiving one or more business objects that each define a user action for the application program;
receiving one or more metadata elements **for dynamic content generation** and defining parameters for the user actions of the one or more business object;
invoking a controller that is communicatively coupled to one or more actions, one or more widgets, and one or more panels;
receiving a first user request from the user through a browser used to interact with the application program and dispatching the user request to one or more of the actions;
based on a second user request received from the user through the browser, selecting a first panel from the one or more panels and including the first panel in the HTML user interface page;
the controller determining which of the one or more actions is responsible for acting on the first user request;
obtaining, using the one or more actions, one or more parameter values from the business objects and **dynamically manipulating the one or more parameter values;**
using the one or more actions and the business object parameter values, selecting a first widget from the one or more widgets;
associating the first widget with the first panel selected from the one or more

panels, wherein the first widget is arranged into a **specified dynamic layout** within the first panel; and

generating the specified dynamic layout, at runtime, and presenting to the user, a utility comprising the HTML user interface page that includes the first widget arranged into the specified dynamic layout within the first panel; wherein the first widget has the capability of representing properties of the business objects as HTML elements;

wherein the method performed by one or more processors.

Support for the amendment is provided at least in paragraphs [41]-[45], [37], [49], [52], [57] and [65] of the applicants' specification.

It is well founded that to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), the references cited and relied upon must teach or suggest all the claim limitations. In addition, a sufficient factual basis to support the obviousness rejection must be proffered. *In re Freed*, 165 USPQ 570 (CCPA 1970); *In re Warner*, 154 USPQ 173 (CCPA 1967); *In re Lunsford*, 148 USPQ 721 (CCPA 1966). With respect to the present application, it is respectfully submitted that Underwood and Underwood2, individually or in combination, do not describe or suggest all the limitations of Claim 2. It is further submitted that a sufficient factual basis has not been proffered in the Office Action to support the rejection of Claim 2 under 35 U.S.C. §103(a).

Claim 2 recites one or more features that are not described in Underwood and Underwood2, individually or in combination. For example, the references fail to describe "**assisting a user with building an HTML user interface page by:…based on a second user request received from the user through the browser, selecting a first panel from the one or more panels, including the first panel in the HTML user interface page…, associating the first widget with the first panel, and generating … and presenting the specified dynamic layout that includes the first widget within the first panel…**"

Neither reference describes assisting a user with building an HTML user interface page by allowing the user to **select a panel** from one or more panels, **include the panel** in the HTML user interface page, **associating a widget with the panel** and generating … the HTML user

interface page that includes the widget **arranged… within the panel**, as claimed. The only "panels" in Underwood are graphic user interface (GUI) panels that provide a user with tools to build a webpage. Underwood describes a WYSIWYG Panel area 4205 and a display panel 4235 in Underwood's column 23. However, in Underwood, the panels are part of a website builder, **not part of the built/generated webpage**, as claimed.

Underwood's panels are not components of the HTML page displayed once the page is built, as claimed. Underwood's panels are not a part of the resulting HTML page generated for the user, as claimed.

Underwood does not allow the user to **select** panels and to associate the widgets with the selected panels, as claimed. Underwood's panels cannot be **selected** by the user to become part of the final layout of the generated webpage, as claimed.

Underwood2 does not cure the deficiencies of Underwood with respect to "panels," recited in Claim 2. In columns 153 and 159, Underwood2 describes a control panel that is used in the process of installation and configuration of database connectivity. However, the control panel is **not part of the dynamic layout** presented to the user after the user selected the panel to be part of the specified dynamic layout, as claimed. In column 173, 175-177 and 185, Underwood2 describes that a user may adjust a width of a panel and alignment of the panel, but nowhere does Underwood2 describe that the user can **select** a panel from one or more panels, **assign some widgets** to the selected panel, and have the selected panel be part of the specified dynamic layout generated after the HTML user interface page is built, as claimed.

Further, Underwood and Underwood2 fail to describe or suggest "receiving one or more metadata elements for **dynamic content generation** and defining parameters for the user actions, … **dynamically manipulating** the one or more parameter values, generating the specified **dynamic layout** and presenting to the user… the **specified dynamic layout** within the first panel," as recited in Claim 2.

Neither reference captures the concept of dynamic content generation, dynamic content manipulation and dynamic layout generation, recited in Claim 2, to allow the users to build user

interfaces that have a consistent look and feel. Underwood and Underwood2 design a website based on the entered data and description of the website (Underwood, Underwood2: Abstract), but does not allow "receiving one or more metadata elements for **dynamic** content generation," as claimed. In Underwood and Underwood2, all data required to generate the website have to be provided by the designer, but none of the data can be **dynamically** generated upon receiving one or more metadata elements, as claimed. Further, neither reference allows **dynamic** manipulation of the parameter values upon obtaining one or more parameter values from the business object, as claimed. Moreover, the website generated in Underwood/Underwood2 does not have a **dynamic** layout because Underwood and Underwood2' layouts are not dynamically generated, as recited in Claim 2.

Even in combination, Underwood and Underwood2 do not provide the claimed approach. A combination might provide for an interface for building a website and reuse already predefined components. However, no combination enables a developer to select specific panels, assign widgets to the selected panels and specify layouts for the user interface that can be dynamically generated and manipulated, as claimed, and thus, that provides a consistent look and feel.

Therefore, Claim 2 recites one or more features that are not described or suggested by Underwood and Underwood2, individually or in combination. Thus, Claim 2 is patentable over Underwood and Underwood2. Reconsideration and withdrawal of the rejection is respectfully requested.

CLAIMS 13, 23 AND 33

Claims 13, 23, and 33 recite features similar to those in Claim 2. Therefore, Claims 13, 23 and 33 are patentable over Underwood and Underwood2 for the same reasons as Claim 2. Reconsideration and withdrawal of the rejection is respectfully requested.

B. DEPENDENT CLAIMS

The claims that are not discussed above depend directly or indirectly on the claims that have been discussed. Therefore, those claims are patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render

the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time.

II. CONCLUSION

For the reasons set forth above, all of the pending claims are in condition for allowance. A petition for extension of time is hereby made to the extent necessary to make this reply timely filed. If any applicable fee is missing or insufficient, the Commissioner is authorized to charge any applicable fee to our Deposit Account No. 50-1302.

Respectfully submitted,

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Dated: December 16, 2009

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